

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7325

Coastal Manufacturing, Inc.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7325. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the POTW operated by Olympus Terrace Sewer District. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

The fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response.

GENERAL INFORMATION	
Applicant	Coastal Manufacturing, Inc.
Facility Name and Address	4708 Chennault Beach Road Mukilteo, WA 98275
Type of Facility	Metal Fabrication/Metal Finishing (Phosphating)
Facility Discharge Location	Latitude: 47° 53' 44" N Longitude: 122° 17' 46" W
Treatment Plant Receiving Discharge	Olympus Terrace Sewer District
Contact at Facility	Name: Carl Detillion - Environmental Coordinator Telephone No.: (425) 348-5714
Responsible Official	Name: Philip R. Lepley Title: President Address: PO Box 5, Mukilteo, WA 98275-0005

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Coastal Manufacturing is engaged in production of fabricated sheet metal enclosures. Aluminum, steel, and stainless steel sheet are all used as raw material. Prior to painting, the sheet metal products are subjected to a phosphate coating process. Chromate conversion coating was formerly performed on the aluminum sheet, but has now been discontinued. Phosphate coating continues to be employed on the steel sheet. The rinsewater from the phosphate coating process, and its related alkaline cleaning process, comprises virtually all of the process wastewater discharged from the facility, although minor amounts of grinding water may also be discharged at times. The maximum flow rate of the rinsewater discharge is 10,000 gallons per day, although the monthly average is approximately 5,000 gallons per day. These flow rates are the same as those appearing in the previous permit.

The process tank sequence at Coastal Manufacturing is as follows:

Step 1: Fabricated product is dipped in Kerinse Sealer.

Step2: Product is dipped in Chrysoat 747.

Step 3: Product is dipped in Inspro 2500.

Step 4: Product is dipped in the running rinse tank which overflows to the sanitary sewer.

PERMIT STATUS

The previous permit for this facility was issued on April 9, 1997, with an expiration date of June 30, 1999.

An application for permit renewal was submitted to the Department on April 15, 1999.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on January 22, 1998.

During the history of the previous permit, sampling and analysis performed both by the Department, and as reported by Coastal Manufacturing on Discharge Monitoring Reports (DMR's) have indicated consistent compliance with federal categorical standards as well as local limitations for metals and pH, without pretreatment. A continuous pH meter is located in the line leading from the rinsewater overflow to the sanitary sewer.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized in the table below for chromium, copper and zinc, based on values reported on discharge monitoring reports

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between May 1997 and March 1999. Analytical data for cadmium, cyanide, nickel, lead and silver were also reported on DMR's, but as these concentrations were generally undetected, they do not appear in the summary table below.

CHROMIUM, COPPER, AND ZINC EFFLUENT VALUES
FROM DMRS FOR THE PERIOD MAY 1997-MARCH 1999

	Average of Daily Maxima (mg/L)	Maximum (mg/L)	Minimum (mg/L)
Chromium(T)	0.007	1.1	0.007
Copper(T)	0.062	0.8	<0.01
Zinc(T)	0.238	1.13	0.1

SEPA COMPLIANCE

This plant is preexisting and already in possession of a state waste discharge permit. Therefore, submittal of a SEPA checklist is not required for renewal of this permit..

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW. The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal categorical limitations for this facility are found under 40 CFR Part 433.17. These categorical limitations are considered to be consistent with the AKART requirement. The table below indicates the categorical limitations applying to this plant.

In order to protect Olympus Terrace Sewer District from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge or potentially hazardous exposure levels, effluent limitations for certain parameters are necessary. These limitations are based on local limits developed by the Department for Olympus Terrace Sewer District and appear in the table below. A local limits calculation was run for the categorically regulated metals, taking into account conditions specific to that plant. In all cases,

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except that of nickel, the categorical limitations appearing in 40 CFR Part 433.7 (Pretreatment Standards for New Sources) were more stringent than the calculated local limitations. The limitations appearing in bold typeface below indicate the limitation appearing in the permit. The limitations in the proposed permit renewal are based on the most stringent of local limits calculated for Olympus Terrace Sewer District and the categorical limitations found in 40 CFR 433.17 (Pretreatment Standards for New Sources).

Federal and Site-Specific Bases for Limitations Coastal Manufacturing			
Pollutant Parameter	Daily Maximum 40CFR433.17 (mg/L)	Monthly Avg 40CFR433.17 (mg/L)	Calculated Local Limit (mg/L)
cadmium	0.11	0.07	0.11
chromium	2.77	1.71	3.6
copper	3.38	2.07	4.4
cyanide	1.20	0.65	1.77
lead	0.69	0.43	0.91
nickel	3.98	2.38	2.64
silver	0.43	0.24	3.20
zinc	2.61	1.48	8.34
TTO	2.13	N/A	N/A

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly and that effluent limitations are being achieved (WAC 173-216-110). As noted in the table appearing in the wastewater characterization section above, copper, chromium, and zinc appear to be the only metals parameters which are likely to be present in environmentally significant quantities. Therefore, monthly monitoring is retained for these parameters. Although the remaining metals parameters (cadmium, nickel, lead, and silver) and cyanide do not appear to be present in environmentally significant quantities, USEPA requires that all regulated parameters be sampled at least two times per year. As the plant does not use solvent degreasing, it is authorized to use submittal of a TTO certification statement in lieu of TTO monitoring, as authorized under 40 CFR, Part 433.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S.3. are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee maintain an adequate solid waste plan, review it periodically and update it as necessary to prevent solid waste from causing pollution of the waters of the state.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to periodically review and update this plan as may be necessary to prevent accidental releases to the waters of the state or the sanitary sewer.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW, therefore, a slug discharge control plan is required [40 CFR 403.8 (f)].

TOXIC ORGANIC MANAGEMENT PLAN

The Permittee is required to submit and maintain a Toxic Organic Management Plan, as it is authorized to submit a TTO certification plan in lieu of sampling for TTO's.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending, or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for such a period as to expire in state Fiscal Year 2004 (July 1, 2003 - June 30, 2004) in order to be consistent with the state's Basin Planning-based permit issuance schedule.